

Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

FREDRICK and ANNALESA THOMAS; and
JO-HANNA READ, as Guardian ad Litem of
E.T., a minor,

Plaintiffs,

v.

JASON CANNON; BRIAN MARKERT;
RYAN MICENKO; MICHAEL WILEY;
MICHAEL ZARO; CITY OF FIFE; CITY OF
LAKEWOOD; and PIERCE COUNTY
METRO SWAT TEAM,

Defendants.

FREDRICK THOMAS and ANNALESA
THOMAS, as Co-Administrators of the Estate
of Leonard Thomas, and its statutory
beneficiaries,

Plaintiffs,

v.

BRIAN MARKERT; MICHAEL WILEY;
NATHAN VANCE; MICHAEL ZARO;
SCOTT GREEN; JEFF RACKLEY; CITY OF
FIFE; CITY OF LAKEWOOD; PIERCE
COUNTY METRO SWAT TEAM; and JOHN
DOES 1 through 10,

Defendants.

Nos. 3:15-05346 BJR
3:16-cv-05392
CONSOLIDATED CASES

DECLARATION OF JANET DIAZ IN
SUPPORT OF PLAINTIFFS' PETITION
FOR REASONABLE ATTORNEYS' FEES
AND COSTS

DECLARATION OF JANET DIAZ RE:
MOTION FOR FEES AND COSTS - 1

No. 3:15-05346 / 3:16-cv-05392

10633.1 kg251401

MACDONALD HOAGUE & BAYLESS
705 Second Avenue, Suite 1500
Seattle, Washington 98104
Tel 206.622.1604 Fax 206.343.3961

I, Janet Diaz, declare as follows:

1. I am over the age of 18 and am competent to testify.

2. I am the Director of Administration at MacDonald Hoague & Bayless ("MHB"), and have held that position since October, 2016. Previously, I was the Office Administrator at the Houston, Texas office of Baker Botts, a global AMLAW 50 law firm. Before that I served as Chief of Staff to the Hon. Ted Poe, Congressman from Texas and spent over 20 years with the Houston Bar Association. I am a long-time active member of the Association of Legal Administrators and have served as a Peer Assistance Review Consultant for the American Bar Association.

3. On July 31, 2017, I was asked by Tim Ford, a Director at MHB, to gather details regarding fee rates for lawyers in comparable firms in the Seattle, Washington area. I obtained the following information in THE AMERICAN LAWYER, an often used source by legal administrators.

Seattle

City	2011 Rate	2012 Rate	%	2013 Rate	%	2014 Rate	%	2015 Rate	%	2016 Rate	%	2017e Rate	%
AMLAW (101-200)													
Senior Partner	\$513	\$565	10%	\$588	4%	\$610	4%	\$628	3%	\$641	2%	\$692	8%
Partner	\$359	\$374	4%	\$390	4%	\$405	4%	\$417	3%	\$425	2%	\$457	8%
Counsel	\$350	\$365	4%	\$380	4%	\$393	3%	\$405	3%	\$413	2%	\$444	8%
Senior Associate	\$246	\$250	2%	\$335	34%	\$390	16%	\$402	3%	\$410	2%	\$424	3%
Associate	\$302	\$320	6%	\$333	4%	\$347	4%	\$357	3%	\$364	2%	\$402	10%
Overall	\$354	\$375	6%	\$405	8%	\$429	6%	\$442	3%	\$451	2%	\$484	7%

4. To generate this chart, over hundreds of pages of data were reviewed to locate information specific to our region of the country and to firms of a similar size and/or legal caliber. To further narrow the data, I sorted it by the category of law firms between the 101st and 200th largest grossing nationally for comparison, and although MHB is a significantly smaller sized firm, I believe the qualifications and skills of MHB lawyers are at least equivalent to those of such mid-sized national firms.

I swear under penalty of perjury under the laws of the United States that the above is true to the best of my knowledge.

/s/ Janet Diaz

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CERTIFICATE OF SERVICE

I certify that on the 1ST day of August, 2017, I filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following:

Attorneys for All Defendants:

Richard B Jolley: rjolley@kbmlawyers.com
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s/Terri Flink
Terri Flink, Legal Assistant

DECLARATION OF JANET DIAZ RE:
MOTION FOR FEES AND COSTS - 4

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